

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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MARLENE M. LAPLANT, on her own behalf  
And on behalf of a class similarly situated,

Plaintiffs,

v.

Case No. 2:11-CV-00910

THE NORTHWESTERN MUTUAL  
LIFE INSURANCE COMPANY,

Defendant.

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**MOTION TO FILE DOCUMENTS UNDER SEAL**

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Movant Northwestern Mutual Life Insurance Company (“Movant”), by and through its undersigned counsel, hereby moves the Court for entry of an Order authorizing Movant to file under seal an Objection to Plaintiffs’ Counsels’ Fee Request (“Objection”), and respectfully represents:

1. Movant seeks to file its Objection under seal because it is citing information relating to Milwaukee law firm fees that it obtained from a proprietary database pursuant to a contract. Under this contract, Movant may not disclose the source of this proprietary information to any third party. However, Movant has obtained a waiver to allow it to disclose the source of this information by filing it under seal in this Court.
2. Movant requests that the Court accept this Objection under seal, and permit only the parties in this case and the Court to have access to the Objection, and that this seal be permanent. A redacted form of the Objection will also be filed publicly, which will exclude the citation to the proprietary database.

3. In accordance with the Court's CM/ECF procedures, Movant has separately filed the Objection with access restricted to Court users only. Movant acknowledges and understands that if this Motion is not granted, Movant will have the opportunity to withdraw the Objection before the public is given access to the document

WHEREFORE, after notice and a hearing if necessary and appropriate, Defendant respectfully requests that the Court enter an Order permitted Defendant to file the above-described document under seal.

By: /s/ Joshua D. Maggard

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Attorneys for Defendant  
The Northwestern Mutual Life Insurance Company

### **CERTIFICATE OF SERVICE**

I certify that a true copy of the foregoing was served via the ECF system which will send a notice of electronic filing to the following: George Kersten, Jeffrey A. Bartos, Mark B. Pollack.

s/ Joshua D. Maggard